

1 JEMMA DUNN
Nevada Bar No. 16229
2 MATTHEW T. HALE
Nevada Bar No. 16880
3 MARIAN L. MASSEY
Nevada Bar No. 14579
4 **GREENBERG GROSS LLP**
1980 Festival Plaza Drive, Suite 730
5 Las Vegas, Nevada 89135
Telephone: (702) 777-0888
6 Facsimile: (702) 777-0801
JDunn@GGTrialLaw.com
7 MHale@GGTrialLaw.com
MMassey@GGTrialLaw.com

8 *Attorneys for Plaintiff*

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 CLARA HAMILTON, an individual,

13 Plaintiff,

14 v.

15 BATTLEBORN MEDICAL MANAGEMENT
LLC, a Nevada limited liability company;
16 SAGEBRUSH HEALTH SERVICES, a
Nevada nonprofit corporation,

17 Defendants.
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Case No.: 2:24-cv-02378-GMN-DJA

**STIPULATION TO EXTEND DEADLINE
FOR PLAINTIFF TO RESPOND TO
DEFENDANT SAGEBRUSH HEALTH
SERVICES' MOTION FOR SUMMARY
JUDGMENT (ECF NO. 36)**

(FIRST REQUEST)

19 **IT IS HEREBY STIPULATED** by and between Plaintiff Clara Hamilton ("Plaintiff"), by
20 and through her respective counsel of record, and Defendant Sagebrush Health Services
21 ("Defendant"), by and through its respective counsel of record, that Plaintiff shall have until
22 December 19, 2025 to file her response to Defendant's Motion for Summary Judgment. This
23 Stipulation is submitted and based upon the following:

24 1. Plaintiff's Complaint was filed in the United States District Court, District of Nevada
25 on December 19, 2024, and asserted claims related to Plaintiff's employment with Defendant. (ECF
26 No. 1).

27 2. On November 21, 2025, Defendant filed a Motion for Summary Judgment. (ECF No.
28 36).

1 3. Plaintiff's counsel requires additional time to complete the response due to pre-
2 existing scheduling conflicts and the need to review recently received information pertinent to the
3 motion. The extension will allow for a thorough and accurate response without prejudicing either
4 party. Accordingly, Plaintiff respectfully requests a brief extension to the response deadline to
5 respond to the Motion.

6 4. The Parties have agreed to extend the deadline for Plaintiff to file her response to
7 Defendant's Motion for Summary Judgment by one-week, from December 12, 2025 to December
8 19, 2025, based upon Plaintiff's pre-existing scheduling conflicts and the need to review recently
9 received information pertinent to the Motion.

10 5. This is the first stipulation to extend the time for Plaintiff to respond to Defendant's
11 Motion for Summary Judgment.

12 6. The Parties believe these circumstances constitute good cause for granting an
13 extension. *See* Fed. R. Civ. P. 6(b)(1).

14 7. This Stipulation is made in good faith and not for the purpose of delay.

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SO STIPULATED.

Dated this December 10, 2025.

GREENBERG GROSS LLP

WHITEHEAD & WHITEHEAD PLLC

/s/ Marian L. Massey

/s/ Jonathan J. Whitehead

Jemma E. Dunn, Bar #16229
Matthew T. Hale, Bar #16880
Marian L. Massey, Bar #14579
1980 Festival Plaza Dr., Suite 730
Las Vegas, NV 89135

Jonathan J. Whitehead, Bar # 4415
10389 Double R. Blvd.
Reno, NV 89521

&

Attorneys for Plaintiff

ROBISON, SHARP, SULLIVAN & BRUST

Michael E. Sullivan, Bar #5142
71 Washington Street
Reno, NV 89503

Attorneys for Defendants

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: December 11, 2025